

FILED

JUL 30 2001

PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

IN RE:	)	
	)	CHAPTER 7
INTERNATIONAL HERITAGE, INC.	)	CASE NO. 98-02675-5-ATS
	)	
INTERNATIONAL HERITAGE,	)	CHAPTER 7
INCORPORATED,	)	CASE NO. 98-02674-5-ATS
	)	
Debtors.	)	

**INTERIM APPLICATION FOR SPECIAL ATTORNEY  
FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT**

The undersigned Stephani W. Humrickhouse of Nicholls & Crampton, P.A. ("Applicant") applies to the Court for the entry of an Order approving and authorizing interim Special Attorney for Trustee fees for the period May 1, 2001 to June 30, 2001 in the amount of \$12,256.00 and expense reimbursement in the amount of \$682.48. In support of said Interim Application, Applicant respectfully shows the Court the following:

1. Applicant has acted as Special Attorney for the Trustee since employed and appointed by Order dated January 28, 1999. The services rendered by Applicant and members of its firm have been substantial and Applicant believes that allowance of a fee in full at this time is appropriate and necessary. Additionally, in light of the substantial commitment of time and resources by the Applicant and her firm during this period evaluating the ninety-one (91) avoidance actions initiated and settlement offers associated therewith, applicant requests that the Court consider this Application at this time notwithstanding the fact that the previous fee application was filed less than 120 days ago on May 22, 2001.
2. Fees in the amount of \$107,479.00 and expenses in the amount of \$3,985.54 have been applied for by the Applicant and approved by the Court prior to this Application. However, \$22,803.00 of that \$107,479.00 was applicable to the representation of the Trustee in his claims against the Debtor's principal, Stanley Van Etten and not related to the prosecution of general avoidance actions.
3. To date, the Applicant has delivered the total sum of \$268,187.15 to the Trustee for preferences, which includes \$67,712.51 collected prior to the initiation of the adversary proceedings and \$225,474.64 collected as a result of the adversary proceedings. Monies are collected by the Applicant and delivered to the Trustee to hold in trust pending Court approval. The status of the adversary proceeding cases is as follows:

- a. 34 adversary proceedings have been settled in the sum of \$174,781.28 and approved by the Court.
- b. 7 adversary proceedings have been settled in the sum of \$48,489.60 and are pending court approval.
- c. Default Judgment has been entered in 16 adversary proceedings (2 of which have been satisfied in the sum of \$2,203.76).
- d. 12 adversary proceedings have been dismissed because of a complete defense by the Defendant or the inability to locate the Defendant (all of which have been approved by the Court).
- e. Judgment has been entered in one adversary proceeding after trial in the amount of \$2,620.00.
- f. 1 adversary proceeding has been settled and payment is pending in the amount of \$10,000.00.
- g. 21 adversary proceedings are presently set for trial or final pre-trial.

4. A Summary of Services Rendered which indicates the name of the attorney or paralegal, the hours spent, the hourly rate and total compensation requested is attached as Exhibit A. Attached as Exhibit B is a breakdown by hours and description of the services rendered in connection with this Application. Services rendered were reasonable and necessary in the proper representation of the Trustee. Said Exhibit B reflects an itemization of expenses incurred on behalf of the Trustee by category totals. A separate statement has been created for each adversary proceeding in which time has been entered so that settlement offers can be evaluated more efficiently.

5. The Trustee's agreement to pay the fees at the rates set out herein are substantiated in its Application by Trustee for Authority to Employ and Appoint Attorney Specially dated January 27, 1999. Stephani W. Humrickhouse has rendered professional services of not less than 55.4 hours and that for such professional services Trustee agreed to pay the rate of \$165.00 per hour. Phyllis W. Hill has rendered paralegal services of not less than 19.7 hours and that for such paralegal services Applicant is regularly paid at the rate of \$70.00 per hour. Sandra T. Waller has rendered paralegal services of not less than .4 hours and that for such paralegal services Applicant is regularly paid at the rate of \$70.00. Mary J. Baird has rendered paralegal services of not less than 24.4 hours and that for such paralegal services Applicant is regularly paid at the rate of \$70.00.

6. Stephani W. Humrickhouse is a Partner with Nicholls & Crampton, P.A. She is a Board Certified Specialist in Bankruptcy Law by the North Carolina State Bar Board of Legal Specialization, is a former member of the Bankruptcy Council of the North Carolina Bar Association, previously served as Chairman of its Continuing Legal Education Committee, is a Certified Bankruptcy Specialist by the American Bankruptcy Certification Board and is an experienced Chapter 11 bankruptcy practitioner. Humrickhouse was admitted to the bar in 1980. Humrickhouse regularly charges and has been paid as her ordinary rate \$210.00 per hour. However, based on Court guidelines for the representation of the Trustee, she has only charged \$165.00 per hour during the time period covered by this Application in this case.

7. Phyllis W. Hill is a Paralegal with Nicholls & Crampton, P.A. She attended the University of Tennessee in Knoxville, TN majoring in Business Administration and received her paralegal/legal assistant degree from UT. She has been a paralegal since 1977 with seven years experience in Tax, Estate Planning, Trust and Estate Administration in Knoxville, TN, eight years experience in Civil Litigation with Hunton & Williams in Raleigh, NC and has been with Nicholls & Crampton since February, 1993, concentrating in Bankruptcy.

8. Sandra T. Waller is a Paralegal with Nicholls & Crampton, P.A. She attended Florida State University, Tallahassee, FL and received her paralegal/legal assistant training at Lively Vocational/Technical School, Tallahassee, FL. She has been a paralegal since 1982 with experience in Personal Injury, Medical Malpractice and Litigation. She has been employed at Nicholls & Crampton since January, 1998, concentrating in Bankruptcy.

9. Mary Jane Baird is a Paralegal with Nicholls & Crampton, P.A. She has been a paralegal for 24 years with experience in Medical Malpractice and Insurance Defense. She was last employed with the law firm of Maloof, Lebowitz, Conahan and Oleske in Chatham, New Jersey for 17 years. She has been employed with Nicholls & Crampton since December, 2000, concentrating in Bankruptcy.

10. Copying charges are recorded by client identification number, pursuant to a control counting device connected to Applicant's copying machine. The copying charges are read by Applicant's Office Administrator twice monthly, at mid and end month, and entered into the Accounting Package on those "read" dates. Applicant does not have the ability to further break down the dates such copying charges were incurred other than as expressed above

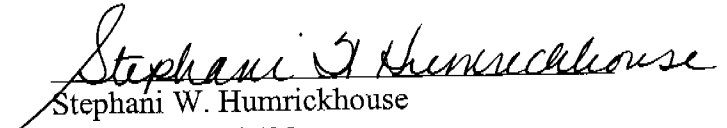
11. Postage charges for are entered cumulatively at month's end.

12. Copies are charged at 20¢ per page, and fax transmissions are charged at \$1.00 per page for out-going transmissions, with no charge for incoming faxes. Deliveries are charged at the rate of \$7.50. Mileage reimbursement was made at the rate of 31¢ per mile.

13. The best interests of Trustee, the Debtor, and the Estates will be served by the allowance of this Application in full.

WHEREFORE, Applicant respectfully requests the Court for the entry of an Order allowing and authorizing Special Attorney for Trustee fees in the amount of \$12,256.00 and expense reimbursement in the amount of \$682.48.

This the 30 day of July, 2001.

  
Stephani W. Humrickhouse  
State Bar No. 9528  
Attorney for Trustee  
Nicholls & Crampton, P.A.  
Post Office Box 18237  
Raleigh, NC 27619  
Telephone: 919/781-1311

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing INTERIM APPLICATION FOR SPECIAL ATTORNEY FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT was served this day by placing a copy thereof in a depository under the exclusive care and custody of the United States Postal Service in a postage prepaid envelope and properly addressed as follows:

Mrs. Marjorie K. Lynch  
Bankruptcy Administrator  
300 Fayetteville St. Mall, Room 416  
P. O. Box 3039  
Raleigh, NC 27602

This the 30 day of July, 2001.

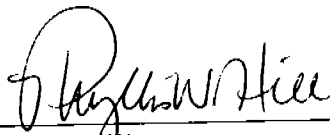
  
\_\_\_\_\_  
Phyllis Hill  
Legal Assistant

Exhibit A  
UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

IN RE:	)	
	)	CHAPTER 7
INTERNATIONAL HERITAGE, INC.	)	CASE NO. 98-02675-5-ATS
	)	
INTERNATIONAL HERITAGE,	)	CHAPTER 7
INCORPORATED,	)	CASE NO. 98-02674-5-ATS
	)	
Debtors.	)	

**SUMMARY OF SERVICES RENDERED**

Nicholls & Crampton, P.A.

From May 1, 2001 through June 30, 2001, the undersigned person/firm has performed professional services for this estate in the capacity of attorney for the Trustee during the Chapter 7 case. Attached hereto is an itemization of time expended and expenses incurred in the performance of these professional services.

<u>NAME</u>	<u>TITLE</u>	<u>HOURS SPENT</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stephani W. Humrickhouse	Partner	55.4	\$165.00	\$9,141.00
Phyllis W. Hill	Paralegal	19.7	\$ 70.00	\$1,379.00
Sandra T. Waller	Paralegal	.4	\$ 70.00	\$ 28.00
Mary J. Baird	Paralegal	24.4	\$ 70.00	\$1,708.00
			TOTAL FEES	\$12,256.00
			TOTAL EXPENSES \$	682.48
			TOTAL AMOUNT REQUESTED	\$12,938.48

In Account With

**NICHOLLS & CRAMPTON, P.A.**

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

Invoice 36365

07/30/01

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Chapter 7

Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

01/02/01	HUM	Respond to Court's request re: defaults; compromises, review status of pleadings	1.50
05/04/01	HUM	Conf. with Craig Adams re: expert testimony and insolvency documentation (.5); Letter to Craig Adams with insolvency documents (.3); Reivew financial data supplied by Brown McLeod (1.5)	2.30
05/09/01	HUM	Finalize dismissals pursuant to approved compromise orders	.70
05/10/01	HUM	Various status updates to files	1.80
05/14/01	HUM	Finalize compromise notice and motions	1.30
05/17/01	PL9	Draft discovery request form for adversary proceedings.	2.00
05/21/01	HUM	Finalize fee application	.80
05/22/01	PL9	Finalize Fee Application for filing, telephone from case administrator re: status of adversary proceedings.	2.00
05/23/01	HUM	Work on discovery request forms	1.50

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/30/01

Invoice 36365  
Page 2

TO  
Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Chapter 7

Return Upper Portion With Payment

05/28/01	PL9	Update filing and organization of files.	.50
05/30/01	PL9	Work on case status chart.	.50
06/05/01	PL9	Telephone call from Case Administrator to discuss cases that need to be set for trial.	.30
06/21/01	PL9	Telephone call from Case Administrator re: consent to extention of time.	.20
06/26/01	HUM	Review orders on compromises	.70
06/28/01	PL9	Work on case status chart.	.80

Fees Billed

\$ 2,190.00

Disbursements

Delivery Charge	\$ 60.00
Telephone Charges	\$ 154.33
Fax	\$ 38.00
Postage	\$ 18.35
1432 Copies @ .20 each	\$ 286.40

Total Disbursements \$ 557.08

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).



In Account With

**NICHOLLS & CRAMPTON, P.A.**

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

Invoice 36365  
Page 3

07/30/01

TO  
Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Amount Paid: 7

Return Upper Portion With Payment

Total Current Bill

\$ 2,747.08

Balance Due

\$ 2,747.08  
=====

Fee Summary

S W Humrickhouse worked 10.60 hours at \$165 an hour.  
Paralegal PWH worked 6.30 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36100

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-004 SWH - Intn'l Heritage Inc / US Off. Prod / Carolina Dist

Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	P33	Preparation of correspondence, service of filed Order Approving Compromise and Settlement.	.20
05/09/01	P33	Filing of Notice of Voluntary Dismissal w/prejudice, preparation and filing of Certification of Service.	.20
05/09/01	HUM	Final review of dismissal.	.20

Fees Billed	\$	61.00
Total Current Bill	\$	61.00
Balance Due	\$	61.00

Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36101

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-008 SWH - Intn'l Heritage Inc / EGW Pers. Services, Inc

Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/14/01	PL9	Prepare Motion to Compromise & Settle Adversary Proceeding and proposed Order.	.50
06/27/01	P33	Preparation/drafting of correspondence enclosing Order Approving Compromise and Settlement; preparation and filing of Notice of Voluntary Dismissal with prejudice.	.50
06/27/01	HUM	Finalize dismissal	.20

Fees Billed \$ 103.00

Disbursements

Postage \$ .34

21 Copies @ .20 each \$ 4.20

Total Disbursements \$ 4.54

Total Current Bill \$ 107.54

Balance Due \$ 107.54

Fee Summary

Paralegal PWH worked .50 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

TO

Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Invoice 36101  
Page 2

Client Id. 00-12075

~~Matter Id. 000-000-008 SWH - Int'l Heritage Inc / EDW Pers. Services, Inc.~~

Amount Paid:

Return Upper Portion With Payment

M J Baird-Paralegal worked .50 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36102

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-009 SWH - Intn'l Heritage Inc / Harrah's Operating Co  
Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	P33	Preparation of correspondence, service of filed Order Approving Compromise and Settlement.	.20
05/09/01	P33	Filing of Notice of Voluntary Dismissal w/prejudice, preparation and filing of Certification of Service.	.20
05/09/01	HUM	Finalize dismissal	.20

Fees Billed	\$ 61.00
Total Current Bill	\$ 61.00
Balance Due	\$ 61.00

Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

Invoice 36103

07/10/01

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-011 SWH - Int'l Heritage Inc / Travel Experts, Inc  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	P33	Preparation of correspondence, service of filed Order Approving Compromise and Settlement.	.20
05/09/01	P33	Filing of Notice of Voluntary Dismissal w/prejudice, preparation and filing of Certification of Service.	.20
05/09/01	HUM	Finalize dismissal	.20

Fees Billed	\$ 61.00
Total Current Bill	\$ 61.00
Balance Due	\$ 61.00

Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

Invoice 36104

07/10/01

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-013 SWH - Intn'l Heritage Inc / Image Assoc Inc  
Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	PL9	Prepare Statement for Authority to Compromise and Settle, letter to Trustee with first month's settlement check.	.70
05/07/01	HUM	Review file re: status	.20
06/08/01	PL9	Letter to Trustee with second settlement check from defendant	.30

Fees Billed \$ 103.00

Disbursements

-----  
Postage \$ 1.02

10 Copies @ .20 each \$ 2.00

Total Disbursements \$ 3.02

Total Current Bill \$ 106.02

Balance Due \$ 106.02  
=====

Fee Summary

Paralegal PWH worked 1.00 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
 ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
 Post Office Box 18237  
 Raleigh, North Carolina 27619  
 Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
 56-1201204

07/10/01

Invoice 36105

TO Holmes P. Harden  
 c/o Maupin, Taylor & Ellis, PA  
 3200 Beechleaf Ct. POB 19764  
 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-014 SWH - Intn'l Heritage Inc / New Orleans Tours, Inc

Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
 but not limited to

05/25/01	HUM	Finalize discovery	.50
05/25/01	P33	Preparation, drafting and service of Plaintiff's First Request for Production of Documents and Interrogatories.	.50
05/29/01	HUM	Prepare for trial, conf. with opposing counsel, appear at trial	2.20
05/29/01	PL9	Trial preparation, exhibits and insolvency documentation, attend trial.	2.00

Fees Billed \$ 620.50

Disbursements

53 Copies @ .20 each \$ 10.60

Fax \$ 3.00

Total Disbursements \$ 13.60

Total Current Bill \$ 634.10

Balance Due \$ 634.10

A finance charge is computed on account balances unpaid 30 days  
 after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).



In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36105  
Page 2

TO

Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Amount Paid:

~~Matter Id. 000-000-014 SWH - Int'l Heritage Inc / New Orleans Tours Inc~~

Return Upper Portion With Payment

Fee Summary

S W Humrickhouse worked 2.70 hours at \$165 an hour.  
M J Baird-Paralegal worked .50 hours at \$ 70 an hour.  
Paralegal PWH worked 2.00 hours at \$ 70 an hour.

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36106

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. PDB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-017 SWH - Intn'l Heritage Inc / Frank Mastroloni & Sons Inc

Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	P33	Preparation of correspondence, service of filed Order Approving Compromise and Settlement.	.20
05/09/01	P33	Filing of Notice of Voluntary Dismissal w/prejudice, preparation and filing of Certification of Mailing.	.20
05/09/01	HUM	Review dismissal and status	.20

Fees Billed	\$	61.00
Total Current Bill	\$	61.00
Balance Due	\$	61.00
=====		

Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36107

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-020 SWH - Intn'l Heritage Inc - Niagara Frontier Travel Ser  
Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/25/01	P33	Preparation, drafting and service of Plaintiff's First Request for Production of Documents and Interrogatories.	.50
05/31/01	HUM	Review motion to amend answer, call to McInnis re: same	.30
06/03/01	HUM	Call to Alan McInnes re: settlement proposal	.30
06/21/01	PL9	Review file and documentation in preparation to respond to discovery and trial.	.50
06/24/01	HUM	Review letter re: extension	.20
06/26/01	P33	Drafting/preparation of correspondence to Holmes Harden and Craig Adams regarding expert witness for upcoming trial.	.20
06/26/01	HUM	Conf. with Allen McInnes re: settlement, trial dates, outstanding issues	.40
06/28/01	HUM	Review settlement proposal	.40
06/29/01	HUM	Letter to Adams and Harden re: availability as witnesses (.2); Letter to McInnes re: settlement,	1.70

A finance charge is computed on account balances unpaid 30 days after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36107  
Page 2

TO  
Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

~~Matter Id. 000-000-020 SWH - Int'l Heritage Inc - Niagara Frontier Travel Ser~~

Amount Paid:

Return Upper Portion With Payment

review settlement and research on  
new value (1.5)

Fees Billed	\$ 628.50
Total Current Bill	\$ 628.50
Balance Due	\$ 628.50

Fee Summary

M J Baird-Paralegal worked .70 hours at \$ 70 an hour.  
S W Humrickhouse worked 3.30 hours at \$165 an hour.  
Paralegal PWH worked .50 hours at \$ 70 an hour.

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36108

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-021 SWH - Intn'l Heritage Inc - Printing Plus, Inc.

Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/02/01	HUM	Review Defendant's 7026 disclosures	.20
05/02/01	HUM	Conf. with Shawna Staton re: document request	.20
05/24/01	HUM	Finalize discovery	.50
05/24/01	P33	Preparation and service of Plaintiff's First Request for Production of Documents and Interrogatories.	.50
05/30/01	HUM	Conf. with Jeff Majewski re: status	.20
06/25/01	HUM	Conf. with Staton re: extension of discovery	.20

Fees Billed	\$	249.50
Total Current Bill	\$	249.50
Balance Due	\$	249.50

Fee Summary

S W Humrickhouse worked 1.30 hours at \$165 an hour.  
M J Baird-Paralegal worked .50 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

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Federal ID #  
56-1201204

Invoice 36109

07/10/01

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-025 SWH - Intn'l Heritage Inc - The Alpha Omega Const. Corp

Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

06/08/01 PL9 Letter to Defendant with Proof of .50  
Claim, letter to Trustee with  
settlement check

Fees Billed \$ 35.00

Disbursements

Postage

\$ .68

8 Copies @ .20 each

\$ 1.60

Total Disbursements \$ 2.28

Total Current Bill \$ 37.28

Balance Due \$ 37.28

Fee Summary

Paralegal PWH worked .50 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
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Raleigh, North Carolina 27619  
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Federal ID #  
56-1201204

Invoice 36110

07/10/01

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-026 SWH - Intn'l Heritage Inc - Carolina Hurricanes Foun  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/10/01 P33 Preparation of correspondence, .20  
service of Order Approving  
Compromise by Dismissal.

Fees Billed	\$ 14.00
Total Current Bill	\$ 14.00
Balance Due	\$ 14.00

Fee Summary

M J Baird-Paralegal worked .20 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

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Federal ID #  
56-1201204

07/10/01

Invoice 36111

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-027 SWH - Intn'l Heritage Inc - Edmundo & Lisa Colorado  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/25/01	HUM	Finalize discovery	.50
05/25/01	P33	Preparation, drafting and service of Plaintiff's First Request for Production of Documents and Interrogatories.	.50
06/12/01	P20	Phone call to/from Billy Brewer re: motion to continue trial	.10
06/29/01	HUM	Review file re: continuance	.20

Fees Billed \$ 157.50

Disbursements

6 Copies @ .20 each \$ 1.20

Total Disbursements \$ 1.20

Total Current Bill \$ 158.70

Balance Due \$ 158.70  
=====

Fee Summary

S W Humrickhouse worked .70 hours at \$165 an hour.  
M J Baird-Paralegal worked .50 hours at \$ 70 an hour.  
S T Waller worked .10 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).



In Account With  
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ATTORNEYS AT LAW

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Federal ID #  
56-1201204

07/10/01

Invoice 36112

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-028 SWH - Intn'l Heritag Inc / Sheraton Operating Corp  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	P33	Preparation of correspondence, service of filed Order Approving Compromise and Settlement.	.20
05/09/01	P33	Filing of Notice of Voluntary Dismissal w/prejudice, preparation and filing of Certification of Mailing.	.20
05/09/01	HUM	Review dismissal	.20

Fees Billed	\$	61.00
Total Current Bill	\$	61.00
Balance Due	\$	61.00

Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

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Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36113

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-029 SWH - Intn'l Heritage Inc - The Enterprise Mgmt Group  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/10/01	P33	Preparation of correspondence, service of Order Approving Compromise by Dismissal.	.20
05/10/01	HUM	Review dismissal	.20

Fees Billed	\$	47.00
Total Current Bill	\$	47.00
Balance Due	\$	47.00
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Fee Summary

M J Baird—Paralegal worked .20 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
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Raleigh, North Carolina 27619  
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Federal ID #  
56-1201204

Invoice 36114

07/10/01

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-031 SWH - Intn'l Heritage Inc - BNY Fin Corp & BNY, Charlotte  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/07/01	P33	Preparation of correspondence, service of filed Order Approving Compromise and Settlement.	.20
05/09/01	P33	Filing of Notice of Voluntary Dismissal w/prejudice, preparation and filing of Certification of Service.	.20
05/09/01	HUM	Review dismissal	.20

Fees Billed	\$	61.00
Total Current Bill	\$	61.00
Balance Due	\$	61.00

Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 70 an hour.  
S W Humrickhouse worked .20 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

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Raleigh, North Carolina 27619  
Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

07/10/01

Invoice 36115

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-033 SWH - Intn'l Heritage Inc - Mike Senio/Dimmock Hill Gol  
Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/15/01	HUM	Conf. with Dyson re: discovery	.30
05/24/01	HUM	Finalize discovery	.50
05/24/01	P33	Preparation and service of Plaintiff's First Request for Production of Documents and Interrogatories.	.50
05/25/01	HUM	Finalize discovery responses	.60
05/25/01	P33	Preparation, drafting and service of Plaintiff's Objections and Response to Defendant's Request for Production of Documents to Plaintiff; and, Interrogatories to Plaintiff.	1.00
05/26/01	HUM	Work on discovery responses	.50
05/30/01	HUM	Finalize discovery	.20
06/21/01	P20	Phone call to C. Castelloe, Mike Senio and David Meschan re: Pretrial Conf. Call and new counsel's participation	.20
06/24/01	HUM	Review withdrawal papers for counsel	.20
06/28/01	HUM	Conf. with Meschan re: settlement,	1.00

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With

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Federal ID #  
56-1201204

07/10/01

TO

Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Invoice 36115  
Page 2

Client Id. 00-12075

~~Matter Id. 000-000-033 SWH - Int'l Heritage Inc - Mike Senio / Dimmock Hill Co~~

Amount Paid:

Return Upper Portion With Payment

pretrial continuance and to clerk  
re: continuance, draft continue  
motion

	Fees Billed	\$ 663.50
Disbursements		
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Delivery Charge	\$	7.50
14 Copies @ .20 each	\$	2.80
Total Disbursements	\$	10.30
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Total Current Bill	\$	673.80
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Balance Due	\$	673.80
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Fee Summary

S W Humrickhouse worked 3.30 hours at \$165 an hour.  
M J Baird-Paralegal worked 1.50 hours at \$ 70 an hour  
S T Waller worked .20 hours at \$ 70 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With

**NICHOLLS & CRAMPTON, P.A.**

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Federal ID #  
56-1201204

07/10/01

Invoice 36116

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-035 SWH - Intn'l Heritage Inc / Allen, Harris, Shaw  
Amount Paid:

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

05/02/01 HUM Review file, respond to .30  
Defendant's request for return of  
settlement

Fees Billed	\$	49.50
Total Current Bill	\$	49.50
Balance Due	\$	49.50

Fee Summary

S W Humrickhouse worked .30 hours at \$165 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).